

1 BRIAN D. SHAPIRO, ESQUIRE
2 Nevada Bar #5772
3 LAW OFFICE OF BRIAN D. SHAPIRO
4 228 S. 4th Street, Suite 300
5 Las Vegas, NV 89101
6 (702) 386-8600
7 (702) 383-0994 fax
8 brian@brianshapirolaw.com
9 Retained Counsel
10 PR #: R.245-010

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11 Attorneys for Secured Creditor, MTGLQ Investors, LP as successor in interest to U.S. Bank
12 National Association, as Trustee for CVF II Mortgage Loan Trust I, its assignees and/or successors
13 in interest

14 UNITED STATES BANKRUPTCY COURT
15 DISTRICT OF NEVADA, LAS VEGAS DIVISION

16 In re

BK-S- 14-15776-led

17 JOSE J GUTIERREZ-VAZQUEZ,

Hearing:

Date: June 24, 2015

Time: 10:00 a.m.

Chapter 13

18 Debtor.

19 **STIPULATION RESOLVING DEBTOR'S PROPOSED CHAPTER 13 PLAN AND**
20 **CONFIRMATION AND DEBTOR'S MOTION TO VALUE COLLATERAL AND**
21 **MODIFY RIGHTS OF MTGLQ INVESTORS, LP AS SUCCESSION IN INTEREST TO U.S.**
22 **BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR CVF II MORTGAGE LOAN**
23 **TRUST I PURSUANT TO 11 U.S.C. § 506(A) AND § 1322**

24 IT IS HEREBY STIPULATED by and between Secured Creditor, MTGLQ Investors, LP
25 as successor in interest to U.S. Bank National Association, as Trustee for CVF II Mortgage Loan
26 Trust I, its assignees and/or successors in interest, through its retained counsel Brian D. Shapiro,
27 Esq., and Debtor, Jose J. Gutierrez-Vazquez, through his counsel, Michael J. Harker, Esq., as
28 follows:

1. Secured Creditor and Debtor hereby agree that Secured Creditor will be paid an
agreed upon amount of \$61,000.00 at 5.25% interest over 57 months through the Plan to satisfy
the claim with respect to the subject property, generally described as 804 Taylor Avenue, North

1 Las Vegas, Nevada 89030, ("Property" herein).

2 2. Debtor hereby agrees that Secured Creditor will be allowed to file a late Proof of
3 Claim based on the settlement amount listed in this agreement.

4 3. It is hereby agreed that Debtor will pay taxes and insurance directly.

5 4. All other terms of the Note and Deed of Trust will remain intact.

6 5. In the event the instant bankruptcy proceeding is dismissed, converted or
7 discharged, this Order shall be terminated and have no further force or effect.

8 6. The Evidentiary Hearing presently scheduled for June 24, 2015 at 10:00 a.m. is
9 hereby vacated.

10 7. The Debtor will amend his Chapter 13 Plan to reflect the terms of this Stipulation.

11 8. Secured Creditor has the authority to file an Ex-Parte Motion seeking to approve
12 this Stipulation with the Bankruptcy Court.

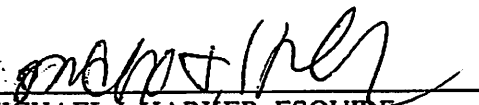
13 9. The undersigned have authority on behalf of their respective Clients to enter into
14 this Stipulation.

15 Submitted By:

16 LAW OFFICE OF BRIAN D. SHAPIRO, LLC

17 By: /s/ Brian D. Shapiro
18 BRIAN SHAPIRO, ESQUIRE
19 Nevada Bar #5772
20 Retained Counsel for Secured Creditor

21 APPROVED/DISAPPROVED:

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23 By: 
24 MICHAEL J. HARKER, ESQUIRE
25 Attorney for Debtors
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